

EXHIBIT B

From: [Cotton, Chris \(SHB\)](#)
To: [David Grimes](#); [William Levin](#); [Laurel Simes](#); [Samira Bokaie](#); [Bela Veksler](#)
Cc: [Alyssa Tillett](#)
Subject: RE: Uber MDL - Judge Breyer's 9/22/25 Order - Request for Deposition Dates
Date: Tuesday, October 14, 2025 8:04:59 PM

David,

Professional courtesies have consistently been extended by Uber to your firm and others throughout this litigation. My email communications (below) to your firm for the past several weeks reflect that courtesy. That being said, an extension was previously allowed by the Court for the discovery ordered by Judge Breyer from Plaintiffs with MDL IDs 1194 and 2350, and Uber will not agree to an additional extension. Further, as I explained below, Uber will oppose your firm's motion to withdraw for the reasons I outlined. In particular, there is no basis for your firm to withdraw, and it would be prejudicial to allow your firm to withdraw at this stage.

Chris

From: David Grimes <dgrimes@levinsimes.com>
Sent: Tuesday, October 14, 2025 7:26 PM
To: Cotton, Chris (SHB) <CCOTTON@shb.com>; William Levin <wlevin@levinsimes.com>; Laurel Simes <lsimes@levinsimes.com>; Samira Bokaie <sbokaie@levinsimes.com>; Bela Veksler <bveksler@levinsimes.com>
Cc: Alyssa Tillett <atillet@levinsimes.com>
Subject: RE: Uber MDL - Judge Breyer's 9/22/25 Order - Request for Deposition Dates

EXTERNAL

Hi Chris,

I just called and left you a message. I'm not sure what you're hoping to get from this beyond what I'm trying to offer. I'm simply asking for professional courtesy as to scheduling while this plays out. I think the only way you could mess this up for yourself is by being unreasonable with the scheduling.

David

From: Cotton, Chris (SHB) <CCOTTON@shb.com>
Sent: Tuesday, October 14, 2025 5:20 PM
To: David Grimes <dgrimes@levinsimes.com>; William Levin <wlevin@levinsimes.com>; Laurel Simes <lsimes@levinsimes.com>; Samira Bokaie <sbokaie@levinsimes.com>; Bela Veksler <bveksler@levinsimes.com>
Cc: Alyssa Tillett <atillet@levinsimes.com>
Subject: RE: Uber MDL - Judge Breyer's 9/22/25 Order - Request for Deposition Dates

David,

There is no basis for your firm to withdraw as to Plaintiffs with MDL IDs 1194 and 2350. In addition, these two Plaintiffs have submitted non-bona-fide ride receipts, and representations have been made to the Court about those submissions. This could have serious consequences for those involved. It would be prejudicial to allow your firm to withdraw at this stage. Accordingly, Uber will oppose your motion to withdraw as to Plaintiffs with MDL IDs 1194 and 2350.

Chris

From: David Grimes <dgrimes@levinsimes.com>
Sent: Tuesday, October 14, 2025 6:32 PM
To: Cotton, Chris (SHB) <CCOTTON@shb.com>; William Levin <wlevin@levinsimes.com>; Laurel Simes <lsimes@levinsimes.com>; Samira Bokaie <sbokaie@levinsimes.com>; Bela Veksler <bveksler@levinsimes.com>
Cc: Alyssa Tillett <atillet@levinsimes.com>
Subject: RE: Uber MDL - Judge Breyer's 9/22/25 Order - Request for Deposition Dates

EXTERNAL

Hi Chris,

I'm not sure I understand why you would oppose the motion to withdraw. How does it hurt you? Are you in a rush with respect to these deadlines?

David

From: Cotton, Chris (SHB) <CCOTTON@shb.com>
Sent: Tuesday, October 14, 2025 4:24 PM
To: David Grimes <dgrimes@levinsimes.com>; William Levin <wlevin@levinsimes.com>; Laurel Simes <lsimes@levinsimes.com>; Samira Bokaie <sbokaie@levinsimes.com>; Bela Veksler <bveksler@levinsimes.com>
Cc: Alyssa Tillett <atillet@levinsimes.com>
Subject: RE: Uber MDL - Judge Breyer's 9/22/25 Order - Request for Deposition Dates

David,

Uber will oppose your firm's motion to withdraw and will not agree to a further extension of the already-extended deadlines ordered by Judge Breyer.

As you know, on July 30, 2025, Uber filed a motion for an order to show cause why Plaintiffs with

MDL IDs 1194 and 2350 (along with certain other Plaintiffs) who have submitted non-bona-fide receipts should not be dismissed. ECF 3604. In response, on August 27, your law firm represented to the Court that “[b]oth Plaintiffs assure us their receipts are authentic.” ECF 3771, at 2. No evidence (declarations or otherwise) was submitted in support of that claim, and no other Plaintiffs subject to Uber’s July 30 motion made similar claims. On September 9, Judge Breyer ordered Plaintiffs with MDL IDs 1194 and 2350 to “(1) produce native versions of their receipts, in accordance with the parties’ agreed upon ESI Protocol (ECF 524), including all available metadata outlined in Appendix 2; (2) produce within 14 days of this Order any documents and communications relating to the production of their ride receipts, the generation of their receipts, and/or the website ‘Makereceipt.com’; and (3) submit within 30 days to a deposition not to exceed 3 hours relating to the authenticity of their receipts.” ECF 3876. On September 12, your firm sought an extension of the deadlines set by Judge Breyer (ECF 3904), which he granted on September 22 (ECF 3977). The already-extended deadlines set by Judge Breyer require these Plaintiffs’ to (1) produce the ordered documents by today and (2) sit for their depositions by October 30. ECF 3977.

Uber reserves its right to seek all appropriate relief in the event Plaintiffs with MDL IDs 1194 and 2350 – who have submitted non-bona-fide receipts – do not comply with the Court’s orders.

Chris

From: David Grimes <dgrimes@levinsimes.com>

Sent: Tuesday, October 14, 2025 4:57 PM

To: Cotton, Chris (SHB) <CCOTTON@shb.com>; William Levin <wlevin@levinsimes.com>; Laurel Simes <lsimes@levinsimes.com>; Samira Bokaie <sbokaie@levinsimes.com>; Bela Veksler <bveksler@levinsimes.com>

Cc: Alyssa Tillett <atillet@levinsimes.com>

Subject: RE: Uber MDL - Judge Breyer's 9/22/25 Order - Request for Deposition Dates

EXTERNAL

Chris,

Sorry for the delay on this. We will be moving to withdraw as counsel from these two cases. Let me know if you’ll agree to extend the deadlines and deposition dates past the hearing on the motion to withdraw.

We’ll get the motion filed shortly.



David M. Grimes | Associate Attorney
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 Direct (415) 426-3133 | Main (415) 426-3000 | Fax (415) 503-5251

From: Cotton, Chris (SHB) <CCOTTON@shb.com>
Sent: Monday, October 13, 2025 6:57 AM
To: David Grimes <dgrimes@levinsimes.com>; William Levin <wlevin@levinsimes.com>; Laurel Simes <lsimes@levinsimes.com>; Samira Bokaie <sbokaie@levinsimes.com>; Bela Veksler <bveksler@levinsimes.com>
Subject: RE: Uber MDL - Judge Breyer's 9/22/25 Order - Request for Deposition Dates

Bill, Laurel, David, Samira, and Bela,

I'm following up on my emails below. It has been nearly two weeks, and I haven't heard back from you regarding the depositions ordered by Judge Breyer of Plaintiffs with MDL IDs 1194 and 2350. If you'd like to propose alternative dates between Oct 20-30 for those depositions, please let me know by end of day tomorrow, October 14. If I don't hear back from you by then, we will proceed with those depositions as previously noticed.

Chris

From: Cotton, Chris (SHB) <CCOTTON@shb.com>
Sent: Monday, October 6, 2025 6:19 PM
To: David Grimes <dgrimes@levinsimes.com>; William Levin <wlevin@levinsimes.com>; Laurel Simes <lsimes@levinsimes.com>; Samira Bokaie <sbokaie@levinsimes.com>; Bela Veksler <bveksler@levinsimes.com>
Subject: RE: Uber MDL - Judge Breyer's 9/22/25 Order - Request for Deposition Dates

David,

Following up on our exchange below from last week, do you have alternative dates to propose between Oct 20-30 for these depositions ordered by Judge Breyer?

Chris

From: Cotton, Chris (SHB) <CCOTTON@shb.com>
Sent: Tuesday, September 30, 2025 12:50 PM
To: David Grimes <dgrimes@levinsimes.com>; William Levin <wlevin@levinsimes.com>; Laurel Simes <lsimes@levinsimes.com>; Samira Bokaie <sbokaie@levinsimes.com>; Bela Veksler <bveksler@levinsimes.com>
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Thanks, David. We'll conduct these depositions in person but can of course be flexible on location and timing within the October 20-30 window. Let me know what works on your end.

Will do regarding Bela.

Chris

From: David Grimes <dgrimes@levinsimes.com>
Sent: Tuesday, September 30, 2025 12:18 PM
To: Cotton, Chris (SHB) <CCOTTON@shb.com>; William Levin <wlevin@levinsimes.com>; Laurel Simes <lsimes@levinsimes.com>; Samira Bokaie <sbokaie@levinsimes.com>; Bela Veksler <bveksler@levinsimes.com>
Subject: RE: Uber MDL - Judge Breyer's 9/22/25 Order - Request for Deposition Dates

EXTERNAL

Hi Chris,

We will reach out to the clients and get back to you. Are you willing to go with remote depositions? Remote will greatly increase our scheduling flexibility.

Also, please include [@Bela Veksler](#) (copied here) on future communications.

Thanks,

David

From: Cotton, Chris (SHB) <CCOTTON@shb.com>
Sent: Monday, September 29, 2025 8:06 PM
To: William Levin <wlevin@levinsimes.com>; Laurel Simes <lsimes@levinsimes.com>; David Grimes <dgrimes@levinsimes.com>; Samira Bokaie <sbokaie@levinsimes.com>
Subject: RE: Uber MDL - Judge Breyer's 9/22/25 Order - Request for Deposition Dates

Bill, Laurel, David, and Samira,

Following up on my emails below, attached are the deposition notices that were served this afternoon for the depositions ordered by Judge Breyer of Plaintiffs with MDL IDs 1194 and 2350. If you would prefer the depositions to occur on different dates and/or at different locations, I'd be happy to discuss mutually agreeable options between October 20-30.

Chris

From: Cotton, Chris (SHB) <CCOTTON@shb.com>
Sent: Friday, September 26, 2025 8:52 AM
To: William Levin <wlevin@levinsimes.com>; Laurel Simes <lsimes@levinsimes.com>; David Grimes <dgrimes@levinsimes.com>; Samira Bokaie <sbokaie@levinsimes.com>

Subject: RE: Uber MDL - Judge Breyer's 9/22/25 Order - Request for Deposition Dates

Bill, Laurel, David, and Samira,

Following up on Judge Breyer's September 22 Order (attached) and my email below, please provide these Plaintiffs' (MDL IDs 1194 and 2350) availability for deposition between October 20-30 by this coming Monday morning (September 29). Uber will issue notices for the depositions that afternoon.

Chris

From: Cotton, Chris (SHB) <CCOTTON@shb.com>

Sent: Wednesday, September 24, 2025 5:26 PM

To: William Levin <wlevin@levinsimes.com>; Laurel Simes <lsimes@levinsimes.com>; David Grimes <dgrimes@levinsimes.com>; Samira Bokaie <sbokaie@levinsimes.com>

Subject: Uber MDL - Judge Breyer's 9/22/25 Order - Request for Deposition Dates

Bill, Laurel, David, and Samira,

I'm following up on the attached September 22, 2025 Order (ECF 3977) issued by Judge Breyer. As you know, the deadlines for Plaintiffs with MDL IDs 1194 and 2350 to produce certain documents and to appear for deposition have been extended to October 14, 2025 (new deadline for document productions) and October 30, 2025 (new deadline for each to appear for a deposition).

Please provide each Plaintiff's availability for a deposition between October 20-30 by this coming Monday morning (September 29). Uber will issue notices for these depositions no later than the afternoon of September 29.

Chris

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